

June 28, 2012

VIA ECFS

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: *Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25; Universal Service Contribution Methodology, WC Docket No. 06-122*

On June 26, 2012, Joe Wetzel (President and Chief Operating Officer, EarthLink) and Chris Murray (Senior Vice President, Public Policy for EarthLink) met with Angela Kronenberg (Wireline Legal Advisor, Commissioner Clyburn) to discuss EarthLink's new strategic direction and the importance of broadband competition to small and medium sized businesses.

In that meeting we emphasized the importance of a robust wholesale market to broadband competition, and briefly discussed the special access proceeding, where we noted that there is particular market power for special access facilities serving small businesses in the U.S.

Regarding the Universal Service contribution methodology proceeding, EarthLink advocated that the Commission should adopt approaches that produce a level playing field, so that companies cannot play arbitrage games with differences in USF rates. Specificity will help provide companies with greater clarity and predictability with these fee assessments.

Please do not hesitate to contact me at <murrayc@corp.earthlink.com> if you have any questions or concerns about this submission.

Respectfully submitted,

/s/

Chris Murray, Senior Vice President, Public Policy
EarthLink, Inc.